

International Document Notice to Agent is Notice to Principal - Notice to Principal is Notice to Agent

# UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS — HOUSTON DIVISION

**Rachael Griffin -EL**, ex rel  
*Plaintiff, in propria persona, sui juris,*

United States Courts  
Southern District of Texas  
**FILED**

AUG 04 2025

v.  
**JPMORGAN CHASE BANK, N.A., JAMIE DIMON, et al.**,  
*Defendants.*

Nathan Ochsner, Clerk of Court

Civil Action No.: 4:25-cv-02013

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## PLAINTIFF'S REBUTTAL TO DEFENDANTS' PURPORTED DISCOVERY/CASE MANAGEMENT PLAN

COMES NOW Plaintiff **Rachael Griffin-El**, *in propria persona*, sui juris, and respectfully submits this **Rebuttal and Notice of Fraud Upon the Court**, stating as follows:

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### 1. No Valid Rule 26(f) Conference.

Plaintiff Rachael Griffin-El, (Moorish American), affirms for the record that no valid or good-faith Rule 26(f) conference ever occurred. Defendants Jamie Dimon, (U.S. Citizen) acting CEO JPMorgan Chase & Co. knowingly misrepresented to this Court that they were unable to reach Plaintiff Rachael Griffin-El, (Moorish American) while in fact directly contacting Plaintiff Rachael Griffin-El, (Moorish American) multiple times by telephone, including a recorded call on **June 17, 2025**, at 12:49 PM (three minutes and five seconds), in which Defendants' agent **Ryan Banks**, (stated he was calling from JPMorgan Chase) notified Plaintiff Rachael Griffin-El, (Moorish American) that Defendants had wrongfully sold Plaintiff's ancestral estate at foreclosure despite prior dispute. estate was sold despite Plaintiff's prior **affidavit of dispute, memorandum of trust, and adverse claim**.

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### 2. Recorded Calls Prove Contact.

Plaintiff has audio recordings proving that Defendants were fully able to communicate with Plaintiff at all times relevant. Therefore, Defendants' claim that they could not reach

Plaintiff is knowingly false and designed to mislead this Court and maintain a false narrative of non-cooperation.

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**3. Fraudulent Hypothecation in Violation of Treaty Obligations.**

Plaintiff asserts that the alleged “mortgage” transaction is an unlawful hypothecation of her Indigenous ancestral estate, disguised as a **Bill of Attainder styled as a mortgage statement (dead pledge)**, done without full disclosure, lawful consideration, or Plaintiff’s knowing, willing, and intentional consent. Such hypothecation violates Plaintiff’s protected Moorish American Indigenous status and the **Treaty of Peace and Friendship of 1836** between the Moroccan Empire and the United States, which recognizes the peaceable rights, separate estates, and secured trade relationships of the Moorish American People, free from exploitation by foreign corporate fictions.

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**4. Mail Fraud — 18 U.S.C. § 1341.**

Defendants used the United States Mail to transmit these fraudulent instruments, constituting mail fraud under **18 U.S.C. § 1341**. Any acts arising from this unlawful scheme, including the alleged foreclosure and any related eviction or forced removal, are **null and void ab initio** and violate both federal criminal law and constitutional prohibitions on Bills of Attainder.

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**5. Improper Inclusion of Terrence Tremayne Griffin.**

Defendants’ attempt to involve **Terrence Tremayne Griffin** is improper, irrelevant, and an attempt to complicate this matter and shift liability for Defendants’ own default. Mr. Griffin’s name appears nowhere on any Bill of Attainder styled as a mortgage statement (dead pledge) or related instruments.

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**6. Final Divorce Decree — Exhibit M.**

Plaintiff attaches as **Exhibit M** true and correct copies of the relevant portions of her Final Divorce Decree — specifically the heading page, page 55 of 63, and page 60 of 63 — which establish the grounds of cruelty, the lawful dissolution of marriage with Terrence Tremayne Griffin, and the permanent restraining order requiring him to stay away from Plaintiff. Plaintiff respectfully declines to attach the full decree because it contains confidential information relating to minor children, which is irrelevant and protected by law.

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### **7. No Lawful Interest in Property.**

Exhibit M confirms that Terrence Tremayne Griffin has **no lawful, equitable, or contractual interest** in Plaintiff's ancestral estate, the subject property, or any alleged mortgage or foreclosure. Plaintiff's ancestral estate is her sole separate property, and Defendants' attempt to connect Mr. Griffin is wholly baseless.

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### **8. Non-Consent to Fraudulent Process.**

Plaintiff does not and will not consent to any purported Discovery/Case Management Plan that arises from Defendants' fraudulent foreclosure, mail fraud, hypothecation, and material misrepresentation. Any so-called "plan" is defective, void, and an extension of the same fraud already placed on record.

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### **9. Reservation of Rights.**

Plaintiff reserves all rights to seek sanctions, default judgment, quiet title, injunctive relief, and any other lawful or equitable relief under trust law, federal law, constitutional law, international human rights instruments and Treaty of peace and friendship September 16, 1836

### **Exhibit M:**

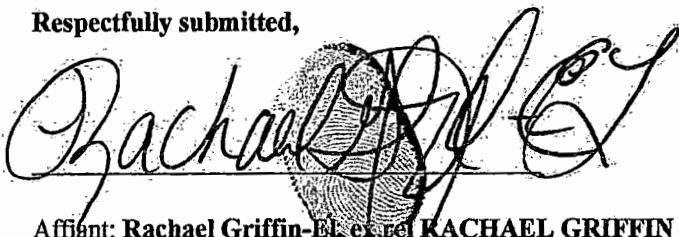
Relevant excerpts from Plaintiff's Final Divorce Decree (Heading page, page 55 of 63, page 60 of 63)

**Executed under penalty of perjury under the laws of the United States of America and the Texas Republic this 3<sup>rd</sup> day of August, 2025.**

I, **Rachael Griffin-El**, declare under penalty of perjury under Divine Law, the Zodiac Constitution, and the Constitution for the United States (1791), do affirm and certify true, correct, under the laws of the United States of America that the foregoing facts and statements are true and correct to the best of my knowledge, information, and belief.

Executed this 3<sup>rd</sup> day of August, 2025.

Respectfully submitted,



Affiant: **Rachael Griffin-El**, c/o **RACHAEL GRIFFIN**  
All Rights Reserved – Without Prejudice – UCC 1-308



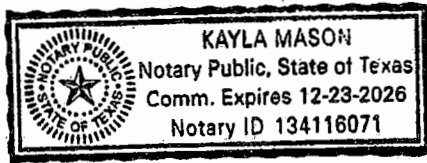
c/o 703 Deveron Lane, Houston, Texas Republic [77090]  
Non-domestic, Non-resident, Zip Exempt

**JURAT / NOTARIZATION BLOCK**

**STATE OF TEXAS  
COUNTY OF HARRIS**

Before me, Rachael Griffin El, on this 3<sup>rd</sup> day of August, 2025, I full life Rachael Griffin -El, known to me (or satisfactorily proven) to be the natural person whose title is subscribed to the foregoing instrument, and acknowledged that she executed the same for the purposes therein expressed.

[Seal and Signature of Notary Public]



Kayla Mason  
KAYLA MASON

Notary Public, State of Texas  
My commission expires: 12-23-2026



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**VERIFICATION, Rachael Griffin El, under Divine Law, the Zodiac Constitution, and the Constitution for the United States (1791), do affirm and certify that a true, correct, and complete copy of this, PLAINTIFF'S REBUTTAL AND NOTICE OF FRAUD UPON THE COURT**

on the 3<sup>rd</sup> day of Aug 2025 to the following parties:

executed on this 3 day of Aug 2025.



Affiant: Rachael Griffin-El, AKA RACHAEL GRIFFIN  
All Rights Reserved – Without Prejudice – UCC 1-308  
c/o 703 Deveron Lane, Houston, Texas Republic [77090]  
Non-domestic, Non-resident, Zip Exempt

- Nicholas J. Ganjei, – Southern District of Texas
- Scott Bessent – U.S. Treasury, Office of Foreign Assets Control
- Marco Rubio – United States Secretary of State
- Pamela Bondi – United States Attorney General
- Volker Türk – United Nations High Commissioner for Human Rights
- T. Michael O'Connor – U.S. Marshal, Southern District of Texas
- Sheriff Ed Gonzalez -Harris County Sheriff
- Office of Consul General – Morocco, Maghrib al-Aqsá
- Jane Nelson – Texas Secretary of State
- Jamie Dimon -JPMORGAN Chase, CEO



# **Exhibit M**

**NO. 2008-39956**

**IN THE MATTER OF  
THE MARRIAGE OF**

**RACHAEL LEE GRIFFIN  
AND  
TERRENCE GRIFFIN**

**AND IN THE INTEREST OF  
ERYKAH GRIFFIN, TERRENCE  
GRIFFIN AND SARA GRIFFIN,  
CHILDREN**

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**IN THE DISTRICT COURT**

**311TH JUDICIAL DISTRICT**

**HARRIS COUNTY, TEXAS**

**FINAL DECREE OF DIVORCE**

On February 23, 2009 the Court heard this case.

*Appearances*

Petitioner, Rachael Lee Griffin, appeared in person and through attorney of record, Shailey Gupta-Brietzke, and announced ready for trial.

Respondent, Terrence Griffin, has made a general appearance and was duly notified of trial but failed to appear and defaulted.

*Record*

The record of testimony was duly reported by the court reporter for the 311th Judicial District Court.

*Jurisdiction and Domicile*

The Court finds that the pleadings of Petitioner are in due form and contain all the allegations, information, and prerequisites required by law. The Court, after receiving evidence, finds that it has jurisdiction of this case and of all the parties and that at least sixty days have elapsed

husband has the sole right to withdraw funds or which are subject to the husband's sole control.

H-2. All sums, whether matured or unmatured, accrued or unaccrued, vested or otherwise, together with all increases thereof, the proceeds therefrom, and any other rights related to any profit-sharing plan, retirement plan, Keogh plan, pension plan, employee stock option plan, 401(k) plan, employee savings plan, accrued unpaid bonuses, disability plan, or other benefits existing by reason of the husband's past, present, or future employment.

H-3. The 2005 Chevrolet Silverado motor vehicle, vehicle identification number 2GGEC73T2621124453, together with all prepaid insurance, keys, and title documents.

Property to Wife

~~IT IS ORDERED AND DECREED~~ that the wife, ~~Rachael Lee Griffin~~, is awarded the following as her sole and separate property, and the husband is divested of all right, title, interest, and claim in and to that property:

W-1. ~~The following real property, including but not limited to any escrow funds, prepaid insurance, utility deposits, keys, house plans, home security access and code, garage door opener, warranties and service contracts, and title and closing documents:~~

~~Lt 5 Blk. 2, Ella Crossing Sec. 1~~

~~703 Deveron Lane, Houston TX 77050~~

W-2. All household furniture, furnishings, fixtures, goods, art objects, collectibles, appliances, and equipment in the possession of the wife or subject to her sole control.

W-3. All sums of cash in the possession of the wife or subject to her sole control, including



The permanent injunction granted below shall be effective immediately and shall be binding on Rachael Lee Griffin; on her agents, servants, employees, and attorneys; and on those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise.

~~IT IS ORDERED AND DECREED that Rachael Lee Griffin is permanently enjoined from:~~

1. ~~Causing physical contact or bodily injury to Terrence Griffin or threatening Terrence~~  
Griffin with imminent bodily injury.
2. Communicating in person, by telephone, or in writing with Terrence Griffin, except for arranging visitation or notifying Terrence Griffin of circumstances affecting the best interest of the children.
3. Coming within 200 feet of, entering, or remaining on the premises of the residence of Terrence Griffin, located at 703 Deveron Ln, Houston TX 77090, or place of employment of Terrence Griffin for any purpose, except to exercise visitation granted in this decree.
4. Interfering in any way with the Managing Conservator's possession of the children or taking or retaining possession of the children, directly or in concert with other persons, except as permitted by order of the Court.

The Court finds that, because of the conduct of Terrence Griffin, a permanent injunction against him should be granted as appropriate relief because there is no adequate remedy at law.

The permanent injunction granted below shall be effective immediately and shall be binding on Terrence Griffin; on his agents, servants, employees, and attorneys; and on those persons in active concert or participation with them who receive actual notice of this order by personal service or

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Total Postage and Fees \$10.77

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 Street and Apt. No., or PO Box No.  
210 Park Ave  
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New York, NY near 10017 United State

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 Street and Apt. No., or PO Box No.  
950 Pennsylvania Ave. NW  
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Washington DC 20530

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 Street and Apt. No., or PO Box No.  
1000 Louisiana St. # 2300  
 City, State, ZIP+4®  
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CH-1211 Geneva 10, Switzerland

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